

Message

From: Laura Jensen [ljensen@rouxinc.com]
Sent: 1/8/2019 5:56:26 PM
To: Cirian, Mike [Cirian.Mike@epa.gov]
CC: Berry, David [Berry.David@epa.gov]; Gunnar Emilsson [EmilssonGR@cdmsmith.com]; Sanchez, Brian [sanchez.brian@epa.gov]; Skipper, Sherry [Skipper.Sherry@epa.gov]; Lynn Woodbury [woodburyl@cdmsmith.com]; Erin Formanek [Formanek@cdmsmith.com]; Coan, Sean [CoanSM@cdmsmith.com]; Dick Sloan [rsloan@mt.gov]; John.Stroiaz@glencore.ca; Steve Wright - CFAC [swright@cfaluminum.com]; Roux IT [mritorto@rouxinc.com]; Andrew Baris [abaris@rouxinc.com]
Subject: RE: EPA comments CFAC BERA Interim Deliverable TMs

Mr. Cirian,

CFAC/Roux reviewed the additional USEPA comments on the BERA interim deliverables. CFAC/Roux are in agreement with all comments provided for the Exposure Modeling interim deliverable, and will proceed with finalizing that document.

On the Refined ESV interim deliverable, the only response which we are proposing a deviation from USEPA's comment is Comment #3 regarding TEQ calculations. Since a conference call to discuss this deviation with EPA's risk assessment team (as suggested in the previous correspondence from CDM) may be difficult to schedule at this time, we are providing the proposed response below.

CFAC/Roux has considered EPA's comment, and proposes the following three substitution methods for non-detected dioxin and furan congener results in the BERA:

1. Assign a value equal to zero (0) for non-detect results (as agreed upon in EPA's comment);
2. Assign a value $0.5 * \text{MDL}$ for non-detect results (as agreed upon in EPA's comment); and
3. Assign the MDL or the laboratory estimated Result_Value for samples with concentrations between the MDL and RL that were validated as non-detect by the validator (this substitution method is a deviation from what EPA specified in the comments [i.e., $0.5 * \text{the sample-specific detection limit}$]). The latter values are conservative substitution values because they consist of any contaminant in the sample plus any contribution from the blank contamination.

If EPA is in concurrence with the third substitution method, CFAC/Roux will modify the approach discussed in the interim deliverable and submit a final version of the document. If EPA cannot provide a response at this time, we are also available to discuss this with CDM personnel if that is permissible during this shutdown period.

Please let me know if you have any questions regarding this response.

Thank you,
Laura

From: Emilsson, Gunnar <EmilssonGR@cdmsmith.com>
Sent: Thursday, December 20, 2018 3:26 PM
To: Laura Jensen <ljensen@rouxinc.com>; Cirian, Mike <Cirian.Mike@epa.gov>
Cc: Berry, David <Berry.David@epa.gov>; Sanchez, Brian <sanchez.brian@epa.gov>; Skipper, Sherry <Skipper.Sherry@epa.gov>; Woodbury, Lynn <woodburyl@cdmsmith.com>; Formanek, Erin <formanek@cdmsmith.com>; Coan, Sean <CoanSM@cdmsmith.com>; Dick Sloan <rsloan@mt.gov>; John.Stroiaz@glencore.ca; Steve Wright - CFAC <swright@cfaluminum.com>; Michael Ritorto <mritorto@rouxinc.com>; Andrew Baris <abaris@rouxinc.com>
Subject: RE: EPA comments CFAC BERA Interim Deliverable TMs

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Laura:

On behalf of Mike Cirian, attached please find EPA's review of the responses to comments to the interim BERA deliverables referenced in your message below.

As you will see in the reviews, EPA accepts all the responses to the comments with two exceptions. Mike requests that you and your risk assessment team schedule a call with Brian, Sherry and Erin to try to reach a resolution on these two outstanding comments prior to our January 16 call.

Also attached is a reference that you requested.

Thank you and Happy Holidays,

Gunnar Emilsson, P.G., P.E., BCEE

Project Manager

CDM Smith

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From: Laura Jensen <ljensen@rouxinc.com>

Sent: Thursday, December 06, 2018 11:51 AM

To: Cirian, Mike <Cirian.Mike@epa.gov>

Cc: Emilsson, Gunnar <EmilssonGR@cdmsmith.com>; Berry, David <Berry.David@epa.gov>; Sanchez, Brian <sanchez.brian@epa.gov>; Skipper, Sherry <Skipper.Sherry@epa.gov>; Woodbury, Lynn <woodburyl@cdmsmith.com>; Formanek, Erin <formanek@cdmsmith.com>; Coan, Sean <CoanSM@cdmsmith.com>; Dick Sloan <rsloan@mt.gov>; John.Stroiazso@glencore.ca; Steve Wright - CFAC <swright@cfaluminum.com>; Michael Ritorto <mrirtorto@rouxinc.com>; Andrew Baris <abaris@rouxinc.com>

Subject: RE: EPA comments CFAC BERA Interim Deliverable TMs

Mr. Cirian,

On behalf of CFAC, attached are the responses to USEPA comments on the draft Interim Deliverables for the Baseline Ecological Risk Assessment Work Plan.

We are proceeding with preparing the risk assessment and will incorporate these responses into that process.

Please contact me if you have any questions regarding this submittal.

Thank you,

Laura

Laura Jensen, P.G. – NY | Project Hydrogeologist

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From: Emilsson, Gunnar <EmilssonGR@cdmsmith.com>

Sent: Thursday, November 1, 2018 5:56 PM

To: Laura Jensen <ljensen@rouxinc.com>

Cc: Cirian, Mike <Cirian.Mike@epa.gov>; 'rsloan@mt.gov' <rsloan@mt.gov>; John.Stroiazzo@glencore.ca; Steve Wright - CFAC <swright@cfaluminum.com>; Michael Ritorto <mritorto@rouxinc.com>; Formanek, Erin <formanek@cdmsmith.com>; Berry, David <Berry.David@epa.gov>; Skipper, Sherry <Skipper.Sherry@epa.gov>; Andrew Baris <abaris@rouxinc.com>

Subject: EPA comments CFAC BERA Interim Deliverable TMs

Laura:

On behalf of Mike Cirian, attached please find EPA's comments to the draft *Technical Memorandum: Proposed Refined Ecological Screening Values to Support the Baseline Ecological Risk Assessment at the Columbia Falls Superfund Site, Former Columbia Falls Aluminum Company Aluminum Reduction Facility, Columbia Falls, Montana* dated September 25, 2018, and draft *Technical Memorandum: Proposed Wildlife Exposure Modeling Approach to Support the Baseline Ecological Risk Assessment at the Columbia Falls Superfund Site, Former Columbia Falls Aluminum Company Aluminum Reduction Facility, Columbia Falls, Montana* dated August 17, 2018.

Please delete the comments to the BERA interim deliverable that I sent yesterday, as I noticed a slight formatting error, and use these two instead.

Thanks,

Gunnar Emilsson, P.G., P.E., BCEE

Project Manager

CDM Smith

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